

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA

Plaintiff,

vs.

JUSTIN SCHNEIER

Defendant.

CASENUMBER: 21-MJ-8154-GCS

CRIMINAL COMPLAINT

I, Treva E. Mathews, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count 1
Attempted Enticement of a Minor

From on or about June 22, 2021, until on or about June 25, 2021, the defendant,

JUSTIN SCHNEIER,

in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, using facilities of interstate commerce, that is a cellphone connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution and in sexual activity under such circumstances as would constitute a criminal act under 720 ILCS 5/11-1.60(d) (Aggravated Criminal Sexual Abuse), in violation of 18 United States Code, Section 2422(b).

I further state that this complaint is based on the following facts:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since 2020. I graduated in December of 2017 from Tiffin University in Tiffin, Ohio, with a master's degree in Criminal Justice. I have six years of experience as a trained law enforcement officer. I am a graduate of the FBI Academy, where I received training in a variety of investigative and legal matters, including topics of Fourth Amendment searches, drafting search warrant Affidavits, and Probable Cause. I am presently assigned to the Springfield Division's Violent Crimes Against Children Squad, which focuses on investigating individuals and dismantling organizations responsible for the sexual exploitation of children through the manufacture and distribution of child pornography. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. In connection with such investigations, I have served as the case agent, have been the affiant for several search warrants, and have conducted interviews of defendants and witnesses. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, and I

have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **JUSTIN SCHNEIER** committed violations of Title 18, United States Code, Section 2422(b).

**BACKGROUND OF INVESTIGATION AND
FACTS ESTABLISHING PROBABLE CAUSE**

4. On approximately June 25 and 26, 2021, agents from the Federal Bureau of Investigation Undercover Employee (“UCE”) with a joint taskforce of various state and federal law enforcement agencies conducted an undercover investigation targeting subjects who were attempting to engage in sexual activity with minors.

5. Starting on approximately June 22, 2021 through June 26 2021, undercover agents began posting ads on various online social media and dating platforms and application. The ads were primarily dating profiles photos of a young-looking male and female adult confidential sources.

6. A residence in Collinsville, Illinois was obtained to be the location that targets were directed to for engaging in sexual activity with the fictitious minors from the online profiles.

7. On approximately June 22, 2021, an FBI UCE posted a profile on an online social media and dating application.

8. An individual who was later identified as **JUSTIN SCHNEIER** (hereinafter referred to as “**SCHNEIER**”) initiated a conversation with UCE, whose profile displayed the name “Lindsey”.

9. The UCE then requested they move the conversation to text message. The UCE texted the **SCHNEIER** at phone number 618-615-5031, which **SCHNEIER** provided to the UCE.

Portions of the conversation are as follows:

SCHNEIER: Oh fun. And how old are you? Your profile says 19
UCE: I'm alittle younger
SCHNEIER: How much?
UCE: I'm almost 15
UCE: Pls don't hate me
UCE: Where'd u go?
SCHNEIER: I don't and I got a phone call. What are you gonna do this weekend?
....
SCHNEIER: So you're a freshman or sophomore
UCE: Ur cute!!!! I luv beards
SCHNEIER: And I'm a freshman

The conversation later continued as follows:

SCHNEIER: ... About to get a shower wanna join? :p
UCE: Haha yeah I would!
UCE: Maybe this weekend when my moms gone
SCHNEIER: Lol oh really? ;). Wanna prove it? :p
UCE: Haha how
SCHNEIER: Maybe let me see what I'd see if you were in the shower with me? :p
UCE: Haha u first
SCHNEIER: Lol you send and I will ;)
UCE: I don't have any pics like that lol
SCHNEIER: Can't you take some?
UCE: I don't like sending nudes and I never sent a pic of my b4
SCHNEIER: I'd be happy with just topless if it's any comfort. But I'd be happy to be the first person you sent one to if you did :)

....

SCHNEIER: If you want me to take your virginity I'd be happy to but only if you tell me you want to do it. I won't force you I promise....

....

UCE: Do u have condoms or do u like have to buy them
SCHNEIER: I have 1 in my wallet. I can go bare the first time and pull out way before I'm ready to cum. But I'll buy some

10. The conversation continued regarding planning a meet up time and location.

SCHNEIER agreed to bring the alcoholic beverage, White Claw, and meet at the undercover house in Collinsville, Illinois.

11. In total, the conversations took place between June 22, 2021 and June 25, 2021. While there were many times where conversation was casual and cordial, there were numerous instances where the conversation was sexually explicit in nature, as was detailed above.

12. **SCHNEIER** walked to the front door of the residence. At that time, law enforcement agents contacted the subject and took him into custody.

13. During a search incident to arrest, agents located a condoms and White Claws, which **SCHNEIER** previously discussed bringing to his encounter with the UCE.

14. **SCHNEIER** was interviewed on location immediately following the arrest.

15. During an interview, **SCHNEIER** that he was the one who had been chatting with the “Lindsey”, UCE profile and he was aware that the she was 14 years old. **SCHNEIER** stated that he would help “Lindsey”, the UCE, “lose her virginity”.

CONCLUSION

16. Based on the foregoing, I submit that there is probable cause to believe that between June 22, 2021 and June 25, 2021, **SCHNEIER** committed the offenses set forth in Count 1 of this Complaint.

Treva E. Mathews

Treva E. Mathews, Special Agent
Federal Bureau of Investigation

STEVEN D. WEINHOFET
United States Attorney



KARELIA RAJAGOPAL
Assistant United States Attorney

Subscribed and sworn to before me this

26th day of June, 2021, at East St. Louis, Illinois.

 Digitally signed by Judge
Sison 2
Date: 2021.06.26 21:30:17
-05'00'

GILBERT C. SISON
United States Magistrate Judge